

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

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Attorneys for Defendant  
Barclays Bank Delaware

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

OLIVER CRISTOBAL,

Plaintiff,

v.

Experian Information Solutions, Inc.; Equifax,  
Inc.; Credit First, National Association; Barclay's  
Bank Delaware and DOES 1 through 100  
inclusive,

Defendants.

Case No. 3:16-cv-06328-RS

**STIPULATION TO EXTEND BARCLAYS  
BANK DELAWARE'S TIME TO FILE  
RESPONSE IN SUPPORT OF MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT  
AND ~~[PROPOSED]~~ ORDER**

Date: March 16, 2017  
Time: 1:30 p.m.  
Place: Courtroom 3

Compl. Filed: November 1, 2016

Honorable Judge Richard Seeborg

[L.R. 6-2]

Case No. 3:16-cv-06328-RS

JOINT STIPULATION TO EXTEND BARCLAYS BANK DELAWARE'S TIME TO FILE RESPONSE IN  
SUPPORT OF MOTION TO DISMISS PLAINTIFF'S COMPLAINT AND [PROPOSED] ORDER

1 This Stipulation to Extend Time to File Response in support of Motion to Dismiss Complaint  
2 is made by and between Plaintiff Oliver Cristobal (“Plaintiff”) and Defendant Barclays Bank  
3 Delaware (“Barclays”) (collectively the “Parties”) through their respective counsel, in light of the  
4 following facts:

5 **RECITALS**

6 On December 5, 2016, Barclays filed a Motion to Dismiss Plaintiff’s Complaint with a  
7 noticed hearing date of March 16, 2017;

8 On December 19, 2016, Plaintiff filed an Opposition to Barclays’ Motion to Dismiss;  
9 Barclays’ Response in support of the Motion to Dismiss is due on or before December 27,  
10 2016;

11 The Parties have reached a settlement in this matter and are in the process of preparing the  
12 settlement agreement;

13 The Parties agree to extend Barclays’ time to file a Response in support of the Motion to  
14 Dismiss by 30 days to January 26, 2017 so that the Parties can prepare and execute the settlement  
15 agreement and file a Stipulation to Dismiss Barclays from this action with prejudice;

16 This extension will not affect the scheduled hearing date for the Motion to Dismiss on March  
17 16, 2017;

18 There is good cause to grant this Joint Motion because the Parties require additional time to  
19 prepare and execute the settlement agreement and file a Stipulation to Dismiss Barclays from this  
20 action with prejudice within the next 30 days.

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**STIPULATION**

Pursuant to Civil Local Rule 6-2, Plaintiff and Barclays stipulate and respectfully request that Barclays' deadline to file a Response in Support of the Motion to Dismiss be extended to Thursday, January 26, 2017.

DATED: December 27, 2016

REED SMITH LLP

By: /s/ Le T. Duong  
Le T. Duong  
*Attorney for Defendant*  
Barclays Bank Delaware  
lduong@reedsmith.com

DATED: December 27, 2016

SAGARIA LAW, P.C.

By: /s/ Elliot w. Gale  
Elliot W. Gale  
*Attorney for Plaintiff*  
Oliver Cristobal

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~~[PROPOSED]~~ ORDER

PURSUANT TO THE STIPULATION, AND FOR GOOD CAUSE SHOWING, IT IS SO ORDERED that Barclays Bank Delaware's deadline to file a Response in support of the Motion to Dismiss Plaintiff Oliver Cristobal's Complaint is extended to January 26, 2017.

Dated: 1/25/17



The Honorable Richard Seeborg  
United States District Judge